

**Federal Defenders  
OF NEW YORK, INC.**

<b>USDC SDNY</b>
<b>DOCUMENT</b>
<b>ELECTRONICALLY FILED</b>
<b>DOC #:</b> _____
<b>DATE FILED:</b> 5/1/2023

Southern District  
Floor, New York, NY 10007  
417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

May 1, 2023

**BY ECF**

Duty Magistrate Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Rm. 5A  
New York, New York 10007

Request GRANTED. SO ORDERED.  
Dated: May 1, 2023

*Stuart J. Aaron*

Re: United States v. Nirvani Sabess  
23-MJ-3400 (UA)

Dear Judge:

Nirvani Sabess, through undersigned counsel, respectfully moves the Court for an order amending the conditions of her pretrial release. Specifically, Ms. Sabess asks the Court to grant her permission to travel to the Eastern District of Pennsylvania. Currently, Ms. Sabess is permitted to travel to the Southern and Eastern Districts of New York as well as the District of New Jersey, where she lives.

The primary reason for Ms. Sabess' request is that her job search is focused on the Philadelphia area and surrounding suburbs. She also spends much of her time in the area given the close proximity to where she lives in New Jersey. Undersigned counsel has conferred with both pretrial services and the government about this request. Neither has any objection to the proposed amendment. Accordingly, Ms. Sabess respectfully asks the Court to add the Eastern District of Pennsylvania to the list of Districts that she is authorized to travel.

Respectfully Submitted,

/s/

Kristoff I. Williams  
Assistant Federal Defenders  
Federal Defenders of New York  
(212) 417-8791

Cc: United States Pretrial Services Officer Vanessa Perdomo (via email);  
Assistant United States Attorneys Adam Sowlati (via ECF)